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April 30, 1998

Mary Cottrell, Secretary  
Massachusetts Department of Telecommunications  
and Energy  
100 Cambridge Street  
Boston, MA 02202

Re: Notice of Inquiry - D.T.E. 98-32

Dear Ms. Cottrell:

Pursuant to the April 3, 1998 "Order Opening Investigation" issued in the above-referenced proceeding, Imperial Oil Resources ("Imperial") hereby submits an original and 15 copies of the Company's Initial Comments in the above-referenced proceeding. Also enclosed are two extra copies which we request be date stamped and returned in the enclosed self-addressed, stamped envelope. In addition, Imperial has submitted an electronic copy of these comments to be posted on the Department's web page.

If you have any questions concerning these matters, please contact the undersigned.

Very truly yours,

William A. Williams

WAW/tlg  
Enclosures